

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

DIANA WILLIAMS,

Plaintiff, **DECLARATION OF MARK  
D. ZUCKERMAN**

-against-

CITY OF NEW YORK, et. al.,

**12-CV-6805 (VEC)**

Defendant.

----- X

**MARK D. ZUCKERMAN**, an attorney duly admitted to practice in the State of New York and the Southern District of New York, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendant City of New York. As such, I am familiar with the facts stated below and submit this declaration to place the relevant information and documents on the record in further support of defendant's motion for partial summary judgment.

2. Annexed hereto as Exhibit M is the complete expert report of plaintiff's expert, Dr. Judy Kegl.

3. Annexed hereto as Exhibit N are excerpts of the deposition transcript of P.O. Christopher Romano, dated April 14, 2014.

4. Annexed hereto as Exhibit O are excerpts of the deposition transcript of P.O. Christopher Romano, dated October 9, 2014.

5. Annexed hereto as Exhibit P are excerpts of the deposition transcript of plaintiff Diana Williams, dated January 27, 2014.

6. Annexed hereto as Exhibit Q are excerpts of the deposition transcript of P.O. Justin Meehan, dated August 12, 2014.

7. Annexed hereto as Exhibit R are excerpts of the deposition transcript of Dr. Samir Maximos, taken pursuant to the City's Rule 30(b)(6) deposition notice served upon the Richmond University Medical Center.

8. Annexed hereto as Exhibit S is the expert report of defendant's psychiatric expert, Dr. Steven Fayer, herein, dated October 9, 2014.

9. Annexed hereto as Exhibit T are the pertinent outside contracts in effect for the NYPD to procure interpretation services on an as needed basis.

10. Annexed hereto as Exhibit U are excerpts and exhibits from the deposition transcript of NYPD Ass't Commissioner of Training Carol Ann Roberson, dated September 29, 2014, taken in response to plaintiff's Rule 30(b)(6) Notice of Deposition herein.

11. Annexed hereto as Exhibit V are the NYPD's attendance records regarding P.O. Romano's attendance at Disabilities Training while attending the NYPD Police Academy.

12. Annexed hereto as Exhibit W are excerpts of the deposition transcript of Sgt. Christopher Maki, dated September 15, 2014.

Dated: New York, New York  
March 17, 2015

\_\_\_\_\_  
\_\_\_\_\_  
/s/  
Mark D. Zuckerman